

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

CARMEN’S CORNER STORE, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF AGRICULTURE,  
*et al.*,

Defendants.

Civil Action No. 1:23-cv-02059-LKG

**JOINT STATUS REPORT REGARDING STATUS OF SETTLEMENT CONSUMATION**

Plaintiffs, Carmen’s Corner Store and Altimont Mark Wilks (the “Plaintiffs”), and Defendants, the U.S. Department of Agriculture (“USDA”), the USDA’s Food & Nutrition Service (“FNS”), Thomas J. Vilsack, sued in his official capacity as the Secretary of the USDA, Stacey Dean, sued in her official capacity as Deputy Under Secretary of FNS, and the United States of America (collectively, the “Defendants” and together with Plaintiffs, the “Parties”), by and through undersigned counsel and pursuant to the Court’s Order of November 2, 2023 (ECF No. 22), respectfully submit this Joint Status Report and state as follows:

1. Plaintiffs filed their Complaint in this case on July 31, 2023, seeking judicial review of, *inter alia*, the Defendants’ decision denying Plaintiffs’ application for the Frederick, Maryland location of Carmen’s Corner Store to participate in SNAP as a result of Mr. Wilk’s prior 2004 drug conviction.

2. On November 1, 2023, the Parties filed a Joint Notice of Settlement and Motion to Stay All Deadlines (the “Joint Notice of Settlement”). ECF No. 21. In the Joint Notice of Settlement, the Parties informed the Court that they had reached an agreement in principle on the terms on which they will settle the remainder of Plaintiff’s claims in this case and requested that

the case be stayed to allow the Parties to consummate that settlement, with a status report due thirty days from the date of the Joint Notice. *Id.*

3. On November 2, 2023, the Court granted the Joint Notice and entered an Order staying all deadline in this case and directing the Parties to file a status report on December 1, 2023 if this case was not voluntarily dismissed by that date. ECF No. 22.

4. Since that time, the Parties have diligently worked towards consummating a settlement, but require additional time to finalize their settlement agreement. The Parties anticipate that they can finalize their agreement within the next 15 days, and subject to the approval of the Court, will file a status report on that date if the case is not dismissed by then.

Respectfully and jointly submitted,

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/s/  
(signed with permission of Jared McClain)  
Jared McClain (Bar No. 21322)  
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**CERTIFICATE OF SERVICE**

I certify that on this 1st day of December, 2023, I electronically served a copy of the foregoing Stipulation on all parties receiving CM/ECF notices in this case.

/s/  
Michael J. Wilson